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February 22, 2023

By ECF and by email

Hon. Paul G. Gardephe
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**Re: United States v. Tara Rose
19 Cr 789 (PGG)**

Dear Judge Gardephe:

I write on behalf of Tara Rose requesting that the Court grant an extension of her surrender date, currently set for March 1, 2023. I ask the Court to delay her surrender date by at least 6 weeks.

I have spoken with AUSA Mat Andrews and the Government consents to this application.

Ms. Rose has not yet been designated by the BOP and it appears that there is a bureaucratic snafu delaying her designation.

Today, I spoke with David Astacio, Supervisor of the United States Marshal Service Criminal Division in the Southern District, and he informed me that because Ms. Rose has a very old prior USMS Registration number and because she was given a new USMS registration number on this case, that the designation paperwork was rejected by the BOP and sent back to the USMS in the Southern District to fix the problem before she can be designated. Mr. Astacio also told me that because the Court has recommended that Ms. Rose be designated to a medical facility, that request can often take more than two months. He said that given the bureaucratic glitch and the specifics of the recommended designation, it is highly unlikely that Ms. Rose will be designated to a medical facility for well over a month, if not longer.

As a result, if Ms. Rose were required to surrender next week, she would be directed to surrender to the USMS in the Southern District and then she would be sent to the MDC Brooklyn, which not only lacks sufficient medical expertise to address a person with Ms. Rose's

medical needs, but which could result in a very prolonged stay at the MDC prior to her being relocated to a BOP medical facility at some future date.

Ms. Rose continues to reside in Florida and continues to remain compliant with her pre-trial/probation obligations. She continues to attend a domestic violence support group through her church and continues to receive counseling services. She remains under doctor's care for her neurological condition.

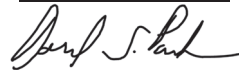
Based upon the foregoing, we respectfully request that the Court grant an extension of Ms. Rose's surrender date until such time as the USMS can fix the bureaucratic glitch, submit the revised paperwork to the BOP Designation center, and Ms. Rose can be designation, hopefully to a BOP medical facility, where she would surrender.

If the foregoing meets with the Court's approval, then I respectfully request that the Court "So Order" this letter.

Thank you for your consideration in this matter.

Respectfully submitted,

Daniel S. Parker

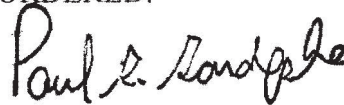


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Cc: AUSA M. Andrews (BY ECF and email)
USMS Supervisor David Astacio (by email)

MEMO ENDORSED: Defendant Tara Rose's surrender date is adjourned to **April 14, 2023**.

SO ORDERED.



Paul G. Gardephe
United States District Judge
Dated: February 24, 2023